

FILED - GR

January 13, 2011 10:26 AM
TRACEY CORDES, CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

APRIL DAWN FRANKLIN,

Defendant.

No.

Hon.

1:11-cr-7

Paul L Maloney

Chief U.S. District Judge

FELONY INFORMATION

The United States Attorney charges:

COUNT 1

(Theft From Employee Benefit Plan)

From on or about January 1, 2006, to on or about July 22, 2009, in Ingham County, in the Southern Division of the Western District of Michigan,

APRIL DAWN FRANKLIN

did embezzle, steal, and unlawfully and willfully abstract and convert to her own use and the use of another moneys, funds, credits, property, and other assets of the Plumbers & Pipefitters Local Union No. 333 Joint Apprenticeship and Training Fund, an employee welfare benefit plan subject to Title I of the Employee Retirement Income Security Act of 1974, in the approximate amount of \$234,331.33.

18 U.S.C. § 664

COUNT 2
(Embezzlement of Labor Organization Assets)

From on or about January 1, 2008, to on or about November 15, 2009, both dates being approximate and inclusive, in Ingham County, in the Southern Division of the Western District of Michigan,

APRIL DAWN FRANKLIN,

being a person employed directly and indirectly by Local 333 of the United Association of Plumbers and Pipefitters AFL-CIO, a labor organization engaged in an industry affecting commerce, did embezzle, steal, and unlawfully and willfully abstract and convert to her own use and the use of another the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$40,886.00.

29 U.S.C. § 501(c)

DONALD A. DAVIS
United States Attorney

A handwritten signature in black ink, appearing to read "Christopher O'Connor", written over a horizontal line.

CHRISTOPHER O'CONNOR
Assistant United States Attorney

Dated: January 13, 2011